

The Honorable Lauren King

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR22-190 LK

SUPERSEDING INFORMATION

LUIS ALBERTO VALENZUELA-HARO,
Defendant.

The United States Attorney charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, and continuing until at least October 25, 2022, in King County, within the Western District of Washington, and elsewhere, LUIS ALBERTO VALENZUELA-HARO, and others known and unknown, did knowingly and intentionally conspire to distribute controlled substances, including: methamphetamine, heroin, cocaine and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), substances controlled under Title 21, United States Code.

It is further alleged that with respect to LUIS ALBERTO VALENZUELA-HARO, and his conduct as a member of the conspiracy charged in Count 1, which includes the

1 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 2 involved 5 grams or more methamphetamine, its salts, isomers, or salts of its isomers, and
 3 50 grams or more of a mixture of substances containing a detectable amount of
 4 methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

5 It is further alleged that with respect to LUIS ALBERTO VALENZUELA-HARO,
 6 and his conduct as a member of the conspiracy charged in Count 1, which includes the
 7 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 8 involved 40 grams or more of a mixture or substance containing a detectable amount of
 9 fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(B).

10 It is further alleged that with respect to LUIS ALBERTO VALENZUELA-HARO,
 11 and his conduct as a member of the conspiracy charged in Count 1, which includes the
 12 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 13 involved 100 grams or more of a mixture or substance containing a detectable amount of
 14 heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

15 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
 16 and 846.

17 **COUNT 2**

18 **(Illegal Alien in Possession of Firearms)**

19 On or about October 25, 2022, in King County, within the Western District of
 20 Washington, LUIS ALBERTO VALENZUELA-HARO, knowing he was an alien
 21 illegally and unlawfully in the United States, did knowingly possess, and did aid and abet
 22 the possession of, in and affecting interstate and foreign commerce, a firearm, that is: an
 23 Ithaca Gun Co. Model 37 Featherlight, 12-gauge shotgun; a Polymer80 Model PF940V2,
 24 9 caliber pistol; a Taurus, Model The Judge, 45/410 caliber revolver; a Marlin Firearms
 25 Co., Model 882, 22 caliber rifle; a Polymer80, Model PF940SC pistol; an Egypt Model

1 Hakim rifle; and a Savage, Model 38B, 410 caliber shotgun, that had been shipped or
 2 transported in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Section 922(g)(5)(A) and 2.

5 **FORFEITURE ALLEGATION**

6 The allegations contained in Counts 1 and 2 of this Superseding Information are
 7 hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

8 Upon conviction of the offense alleged in Count 1, LUIS ALBERTO
 9 VALENZUELA-HARO, shall forfeit to the United States, pursuant to Title 21, United
 10 States Code, Section 853, any property that constitutes or is traceable to proceeds of the
 11 offense, as well as any property that facilitated the offense, including but not limited to
 12 the following:

- 13 a. Approximately \$12,795 in U.S. Currency, seized on or about October 25,
 14 2022;
- 15 b. Eight firearms, and any associated ammunition and magazines seized from
 16 3830 18th Ave SW, Seattle, WA on or about October 25, 2022:
 - 17 1. One Ithaca Gun Co. Model 37 Featherlight, 12-gauge shotgun;
 - 18 2. One Privately Made Firearm, 223 caliber rifle;
 - 19 3. One Polymer80 Model PF940V2, 9 caliber pistol;
 - 20 4. One Taurus, Model The Judge, 45/410 caliber revolver;
 - 21 5. One Marlin Firearms Co., Model 882, 22 caliber rifle;
 - 22 6. One Polymer80, Model PF940SC pistol;
 - 23 7. One Egypt Model Hakim rifle; and
 - 24 8. One Savage, Model 38B, 410 caliber shotgun.

25 Upon conviction of the offense alleged in Count 2, LUIS ALBERTO
 26 VALENZUELA-HARO shall forfeit to the United States, pursuant to Title 18, United
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1 States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c),
 2 any firearms and ammunition that were involved in the offense, including but not limited
 3 to the following:

4 a. Seven firearms, and any associated ammunition seized from 3830 18th Ave
 5 SW, Seattle, WA on or about October 25, 2022:

6 1. One Ithaca Gun Co. Model 37 Featherlight, 12-gauge shotgun;
 7 2. One Polymer80 Model PF940V2, 9 caliber pistol;
 8 3. One Taurus, Model The Judge, 45/410 caliber revolver;
 9 4. One Marlin Firearms Co., Model 882, 22 caliber rifle;
 10 5. One Polymer80, Model PF940SC pistol;
 11 6. One Egypt Model Hakim rifle; and
 12 7. One Savage, Model 38B, 410 caliber shotgun.

13 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
 14 any act or omission of the defendants,

15 a. cannot be located upon the exercise of due diligence;
 16 b. has been transferred or sold to, or deposited with, a third party;
 17 c. has been placed beyond the jurisdiction of the Court;
 18 d. has been substantially diminished in value; or
 19 e. has been commingled with other property which cannot be divided
 20 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 DATED this 23rd day of September, 2024.

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s/ Sarah J. Vogel for

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TESSA M. GORMAN
10 United States Attorney



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12 VINCENT T. LOMBARDI
13 Assistant United States Attorney



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15 CASEY S. CONZATTI
16 Assistant United States Attorney

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